

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ASHFAQ HUSSAIN SYED, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 4:20-CV-00407-MTS
)	
FRONTIER AIR LINES, INC., <i>et al.</i>)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR TWO WEEK EXTENSION OF TIME
TO FILE DESIGNATION OF NEUTRAL/ADR CONFERENCE REPORT**

Come now Plaintiffs, by counsel W. Bevis Schock, Thatcher A. Stone and William T. Woodrow III, (the latter two *pro hac vice*) and in response to the court's Notice of Non-Compliance of October 5, 2020, move for a two week extension of time, to October 19, 2020, to file Designation of Neutral/ADR Conference Report.

In support whereof Plaintiffs state that due to last minute timing problems, which upset the deposition schedule, which in turn upset the mediation schedule, the parties have agreed to delay the mediation, which had been set for October 21, 2020. Judge Mark Seigel has agreed to be the mediator.

The ADR referral is scheduled to end on October 30, 2020. Due to the scheduling issues, the parties anticipate seeking an extension of time to complete the mediation, and also seeking other minor adjustments to the Case Management Order.

The parties have been working hard on the case, and cooperating in a professional manner.

WHEREFORE, Plaintiffs pray the court for a two week extension of time, to October 19, 2020 to file Designation of Neutral/ADR Conference Report.

Respectfully Submitted,

Attorneys for Plaintiff

/s/ W. Bevis Schock .
W. Bevis Schock, 32551MO
Attorney at Law
7777 Bonhomme Ave., Ste. 1300
St. Louis, MO 63105
wbschock@schocklaw.com
Fax: 314-721-1698
Voice: 314-726-2322

/s/ Thatcher A. Stone .
pro hac vice
Stone & Woodrow LLP
250 West Main St. Suite 201
Charlottesville, VA 22902
thatcher@stoneandwoodrowlaw.com
Fax: 646 873-7529
Voice: 855-275-7378

/s/ William T. Woodrow .
pro hac vice
Stone & Woodrow LLP
250 West Main St. Suite 201
Charlottesville, VA 22902
will@stoneandwoodrowlaw.com
Fax: 646 873-7529
Voice: 855-275-7378

CERTIFICATE OF SERVICE

The undersigned certifies that on October 5, 2020 he served this document on:

All counsel of record

The service method was: electronic filing on David Berwin and Michael Reda, and e-mail on all counsel including *pro hac vice* counsel:

David Berwin	dberwin@evans-dixon.com
Michael Reda	mreda@heplerbroom.com
Tara Shelke	tshelke@AMM-LAW.com
Brian T. Maye	bmaye@amm-law.com

/s/ W. Bevis Schock .